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6 Professional Bank

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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION
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12 In Re:) No. 21-50028 SLJ 7
13 Evander Frank Kane,) Chapter 7
14)
15 Debtor,)
16 _____)

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19 Stipulation for, and Request for, Order Extending April
20 5, 2021 Deadline under Bankruptcy Rules 4004(a) and
21 4007(c) to File Complaint to Determine Dischargeability
22 of Debt and to Deny Discharge
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24 Debtor Evander Frank Kane, and Creditor Professional Bank,
25 through their counsel of record, stipulate for, and request the
26 entry of, an order extending to May 5, 2021 the previously set
27 April 5, 2021 deadline to file a complaint to determine the
28 dischargeability of debt and to deny the Debtor's discharge.

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RECITALS

This stipulation is based on the following facts:

1. The Debtor filed his petition for relief under chapter 7 on January 9, 2021.
2. April 5, 2021 is currently fixed as the last day for creditors to file a complaint to determine the dischargeability of debt and/or to object to the debtor's discharge pursuant to Bankruptcy Rules 4004(a) and 4007(c) (the "Bar Date").
3. Professional Bank is listed as a secured creditor in this Bankruptcy with an asserted claim of approximately \$1,354,000 as of bankruptcy filing date.
4. Professional Bank is investigating whether it is appropriate to file an adversary proceeding to deny discharge under 11 U.S.C. Section 727 and/or an adversary proceeding to determine nondischargeability of debt under 11 U.S.C. Section 523.

STIPULATION

WHEREFORE, the subject parties through their counsel of record stipulate to and request the entry of an order extending the Bar Date from April 5, 2021 to and including May 5, 2021.

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1 IT IS SO STIPULATED AND REQUESTED.
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3 Dated: March 19, 2021

FINESTONE HAYES LLP

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/s/ Stephen D. Finestone

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STEPHEN D. FINESTONE
Attorneys for Debtor
Evander Frank Kane

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8 Dated: March 19, 2021

LAW OFFICES OF
STEPHEN G. OPPERWALL

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/s/ Stephen G. Oppewall

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STEPHEN G. OPPERWALL
Attorneys for Creditor
Professional Bank

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14 stipulation for order extending 2021 0405 deadlines.doc.wpd
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